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August 5, 2022

**VIA REGULAR MAIL**

Honorable Cathy L. Waldor  
United States Magistrate Judge  
50 Walnut St. Room 4040, Courtroom 4c  
Newark, NJ 07101

**Re:** DE LOS SANTOS v. PARK PLACE OF NEW JERSEY, LLC et. al.  
Docket No.: 20-cv-11280 (SRC)(CLW)

Dear Honorable Magistrate Judge Waldor:

We represent the Defendants in the above case. A telephone conference was conducted on May 3, 2022. During the conference, I advised the Court that Defendants Park Place of New Jersey, LLC and Salvador Dip intended to file a motion to amend their answer to add third-party claims against co-buyer and possessor of the vehicle Yordy Hernandez Liranzo. I wish to apologize to the Court for my misunderstanding that resulted in my June 2, 2022 motion for leave to file an amended answer being administratively terminated.

A telephone conference was scheduled on June 23, 2022 and the motion was to be addressed at that time. However, due to a scheduling conflict of Plaintiff's counsel, the conference was adjourned to August 30, 2022.

Rather than wait to August 30 to discuss the motion to amend, I write to the Court and respectfully request its authority to file the motion to amend.

I wish to thank the Court for its courtesies. Should the Court have any questions, do not hesitate to contact me.

Respectfully submitted,

ABOYOUN DOBBS, LLC

BY: // Timothy J. Broking //  
TIMOTHY J. BROKING, ESQ.  
For the Firm

cc: All counsel or record